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Attorneys for Defendants Kraft Heinz Company
(improperly sued as Kraft Heinz Foods Company)

[ADDITIONAL COUNSEL ON SIGNATURE PAGE]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

GEORGE BRAHLER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

KRAFT HEINZ FOODS COMPANY,

Defendant.

Case No. 2:16-cv-849 KJM EFB

The Honorable Kimberly J. Mueller

**JOINT STIPULATION TO STAY AND
ORDER**

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3 **JOINT STIPULATION TO STAY**

4 WHEREAS:

- 5 (1) Plaintiff George Brahler filed his Class Action Complaint on April 25, 2016; and
- 6 (2) The deadline for Defendant Kraft Heinz Company (“Kraft Heinz”) to respond to
- 7 Plaintiff’s Class Action Complaint is June 27, 2016; and
- 8 (3) At least twenty other similar complaints have been filed against Kraft Heinz across the
- 9 country, and plaintiffs in five of those cases filed petitions with the United States Judicial Panel
- 10 on Multidistrict Litigation (the “JPML”) seeking to centralize all of the Parmesan-related
- 11 lawsuits against Kraft Heinz in a common jurisdiction; and
- 12 (4) The JPML has scheduled oral argument on those MDL petitions, *In re: 100% Grated*
- 13 *Parmesan Cheese Marketing and Sales Practices Litigation*, MDL No. 2705; *In re: Kraft 100%*
- 14 *Grated Parmesan Cheese Marketing and Sales Practices Litigation*, MDL No. 2707, as well as a
- 15 related MDL petition, *In re: Walmart Great Value 100% Grated Parmesan Cheese Marketing*
- 16 *and Sales Practices Litigation*, MDL NO. 2708, on May 26, 2016 and will likely issue its
- 17 decision regarding centralization in June 2016; and
- 18 (5) In light of the petitions before the JPML and the potential need to coordinate the related
- 19 cases, the parties agree that a brief stay of proceedings pending the JPML’s decision is
- 20 appropriate because it would avoid the need for unnecessary and duplicative discovery and
- 21 motion practice by the parties and conserve valuable judicial resources;

22 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between

23 the undersigned counsel of record that this case be STAYED pending the JPML’s ruling on

24 MDL Petitions 2705, 2707, and 2708. The parties shall submit a joint status report to this Court

25 within five (5) days of the JPML’s ruling.

26 DATED: May 9, 2016

KELLER ROHRBACK LLP

27 By: /s/ Matthew J. Preusch

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Matthew J. Preusch

Attorneys for Plaintiff
George Brahler

DATED: May 9, 2016

JENNER & BLOCK LLP

By: /s/ Kenneth K. Lee
Kenneth K. Lee

Attorneys for Defendant
Kraft Heinz Company

ORDER

Good cause appearing, the court GRANTS the parties' stipulation to stay the case pending the JPML's ruling on MDL Petitions 2705, 2707, and 2708 (ECF No. 12). The parties shall submit a joint status report to this court within five (5) days of the JPML's ruling.

IT IS SO ORDERED.

Dated: May 16, 2016


UNITED STATES DISTRICT JUDGE